

AO 91 (Rev. 11/11) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the

District of New Mexico

United States of America )

v. )

Luis Angel LANDA-Flores ) Case No. 25-623 MJ

)

)

)

)

*Defendant(s)*

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

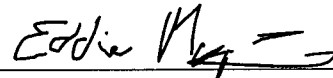
On or about the date(s) of 04/10/2024-04/02/2025 in the county of Dona Ana in the  
State and District of New Mexico, the defendant(s) violated:

*Code Section**Offense Description*

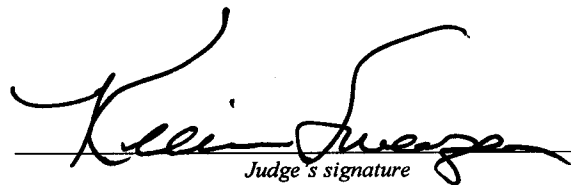
Title 8 USC § 1324(a)(1)(A)(v)(I)  
 Conspiracy to Transport

Knowingly, intentionally, and unlawfully conspired, combined, confederated  
 and agreed with others known and unknown, to commit offenses against the  
 United States, namely; to transport, move, and attempt to transport and move  
 an alien within the United States by means of transportation and otherwise

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.*Complainant's signature*

Eddie Marquez, Border Patrol Agent

*Printed name and title*Sworn to by telephone, \$5 ~~before me and signed in my presence.~~Date: 04/03/2025City and state: Las Cruces, New Mexico*Judge's signature*

United States Magistrate Judge

*Printed name and title*

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

VS

Luis Angel LANDA-Flores

On March 02, 2025, Las Cruces Border Patrol Agents assigned to the Las Cruces Disrupt/Intel Unit, received information that the Interstate 25 Checkpoint was non-operational the day prior, on April 01, 2025. During non-operational hours, it is highly common for Alien Smuggling Organizations (ASO) to utilize this vulnerability to bypass an immigration inspection and pass illegal aliens through further north into the United States.

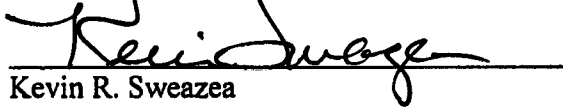
Agents patrolled south on Interstate 25 towards interstate 10. At approximately mile marker 156 on Interstate 10 east bound, Agents observed a red in color Camaro bearing Texas License Plate. Agents recognized this vehicle matching a license plate from a "Be on the lookout" (BOLO) by the Alamogordo Border Patrol Station, of a suspected mass tandem smuggling scheme consisting of 12 vehicles, the red Camaro bearing Texas, being one of them. Agents began to follow the vehicle. It seemed as if the driver, later identified as LANDA-Flores noticed the marked unit, and made an abrupt lane change to the secondary lane. Agents observed the driver drop in speed from approximately 85 miles per hour to approximately 70 miles per hour. Agents decided to conduct a vehicle stop at approximately 0630 hours on mile marker 161 on Interstate 10 east bound.

Agents approached the Camaro from the passenger side. Agent Provencio greeted LANDA-Flores. LANDA-Flores responded with broken English, so BPA asked if Spanish was better to where LANDA-Flores responded yes. BPA identified himself as a U.S. Border Patrol Agent and asked LANDA-Flores for an identification document and questioned LANDA-Flores as to his immigration status. LANDA-Flores readily admitted to being a national of Mexico and being in the country illegally without proper immigration documents. The agent asked LANDA-Flores to hand over the keys to prevent the subject from fleeing. LANDA-Flores complied. Agents asked the LANDA-Flores to step out of the vehicle to where he was then questioned as to his citizenship a second time, verifying LANDA-Flores's illegal status. LANDA-Flores was then advised that he was under arrest for being in the United States illegally. LANDA-Flores granted consent for agents to search the vehicle. LANDA-Flores was searched before being secured inside the marked unit.

During a post-Miranda interview of LANDA-Flores, he stated that he was returning from Albuquerque, New Mexico (NM) and traveling to El Paso, Texas (TX). The purpose of the travel was to deliver financial alien smuggling proceeds, found on his person, to an unknown subject in El Paso, Texas. LANDA-Flores further stated he had just dropped off two illegal aliens in Albuquerque, NM. LANDA-Flores readily admitted having smuggled illegal aliens approximately three additional occasions while working for several known smugglers. One of them being his participation on a failed alien smuggling attempt on April 10, 2024, where he was arrested while transporting 43 illegal aliens at the Interstate-25 Las Cruces United States Border Patrol checkpoint.

Because this affidavit is being submitted for the purpose of establishing probable cause as set forth herein, 8 USC 1324 (a)(1)(A)(v)(I), I have not included each and every fact known to me concerning this investigation.

I make this affidavit on the basis of my personal knowledge and information furnished to me by other law enforcement officers.



Kevin R. Sweazea  
United States Magistrate Judge  
District of New Mexico



Eddie Marquez  
Border Patrol Agent  
United States Border Patrol